



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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April 9, 1986

CERTIFIED RETURN RECEIPT REQUESTED
(P402 458 359)

Mr. A. J. Cornell
President
Castle Valley Mining Company
P. O. Box 1240
Castle Dale, Utah 84513

FILE COPY

Dear Mr. Cornell:

RE: Completeness Review of MR-1 Application, Mining and
Reclamation Plan, White Cap #7 Mine, PRO/015/033, Emery
County, Utah

The Division has reevaluated our initial review comments (dated February 20, 1986) of Castle Valley Mining Company's MR-1 permit application for the White Cap #7 gypsum mine (received December 27, 1985). We have also received (March 19, 1986) your letter dated March 17th which transmitted a copy of the BLM's stipulated approval and a copy of an application form filed with the Southeastern Utah District Health Department for a portable latrine.

It was our understanding as of the last meeting held on March 13, 1986 in the Division's offices, that you would provide a written response to the technical comments as outlined in our February 20th completeness review letter. To date, we have not received any written answers to the specific questions of that letter.

We have acquired copies of all the permitting information you have filed with the area office of the BLM and have evaluated the contents in light of our previous (February 20th) deficiency comments. The following review comments identify specific technical deficiencies which remain to be addressed by Castle Valley Mining Company before the State permitting process can continue.

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Soils Concerns:

Rule M-10(14) SOILS - JSL

It was apparent at the time of the Division's onsite visit to the proposed mine site area that there are limited amounts of soil materials available which are suitable for salvage. There may be other areas where salvaging of the plant growth medium is not feasible or practical.

Noted areas where soil material is available include small ravines, ephemeral drainages and associated topographic surface depressions. The localized areas of gypsum outcrop did not have appreciable amounts of salvagable material available which would warrant stockpiling.

The applicant must make reasonable efforts to strip and stockpile all surficial materials, suitable as a growth medium from those areas proposed to be mined, prior to any surface excavation. The applicant is referred to item #28, page 11 of the MR-1 application form where the opportunity to request a variance to specific reclamation standards is provided. The applicant may wish to reconsider this section and formally request a variance(s) from the standard(s) which may be appropriate to the operational area.

Reclamation Concerns:

Rule M-3(2)(a) LAND USE - KMM

Some estimate of surface resources of the site and vicinity should be included in the statement of land use. The Bureau of Land Management (BLM) or Soil Conservation Service (SCS) should be able to supply an estimate of productivity (AUM's or lbs/acre) or range condition.

Are there any range improvements in the area that may be impacted by the mining or milling operation? The proposed mine site is also potential habitat for three proposed or listed threatened or endangered plant species. The BLM will likely be surveying the area for these species in April - May, 1986 (verbal communication with BLM).

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Rule M-3(2)(e) PLANTING PROGRAM - KMM

The ability of the operator to reclaim portions of the mine area depends on the sequence of mining. The timing and extent of disturbance (in acres per year and total acres disturbed at any one time) is not clearly described in the MR-1. From item #26 of the MR-1 it is not clear if all reclamation is planned at closure of the operation or if partial reclamation will be performed "in the fall of each year". Please clarify. The mining operation should be designed to permit contemporaneous reclamation if at all feasible. ✓

Because of the limited amount of topsoil available and the small mass of vegetation, a separate step of vegetation removal could be eliminated. Vegetation and topsoil could be graded into a single pile. Eventual deterioration of the vegetation will enrich the soil material. The limited amount of topsoil could also be extended and enriched by incorporating additional organic material. Local available old/rotten hay would be an excellent addition to the planting program. ✓

Using "standard farming practices" will be generally suitable on this gently sloping site. The applicant should add to these practices ripping of the subsoil before topsoil is replaced prior to planting. Ripping will improve root penetration. ✓

Rule M-3(12)(2) REVEGETATION SUCCESS STANDARDS - KMM

The success of revegetation (and approval of final bond release) is based on a comparison between the revegetated area and similar vegetation communities near the mine. Reclamation will be judged successful only when the revegetated areas have at least 70 percent of the cover of the surrounding area. A more precise estimate of vegetation cover of the area "using professionally accepted inventory techniques" should be made. The 60-80 percent vegetation cover estimated in the MR-1 (#20) appears to be high and would be a difficult success standard to meet in this dry area. ✓

Closer to 20%

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In item #25 of the MR-1 the applicant states that no fencing is intended. In Attachment 1, #8 the applicant states that the mine area will be fenced. This discrepancy should be cleared up. Considering the heavy grazing in the vicinity, fencing to protect newly planted areas may be warranted to establish adequate vegetation.

Hydrology Concerns:

Rule M-3(1)(c)-(e) & Rule M-6 MAPS AND PLANS - DMW

The applicant must submit a map of adequate scale (1" = 500' or more detail) which clearly identifies such existing features as natural ephemeral channels, directional flow of surface (runoff) water and permit area topography. The map must clearly indicate details of the proposed mining operations including the proposed disturbed area boundary, location of the topsoil stockpile(s), truck loading pads and access roads. The location of any proposed surface runoff and erosional control measures (i.e., berms, diversions, sediment basins, silt fencing, culverts, etc.) should also be clearly identified on the site facilities map.

Bonding Concerns:

Rule M-5 SURETY GUARANTEE - PGL

The BLM requests a \$25,000.00 reclamation surety bond. The applicant must submit a detailed reclamation cost estimate to the Division. This cost must represent a third party cost to perform the reclamation. The cost references used by the Division in cross-checking a cost estimate are the Means Site Work Cost Data Index, the Blue Book Rental Rate Guide, and the Caterpillar Equipment Book. The applicant may use these references or other guides in determining this cost estimate. Please use the bond estimate form (previously sent to you) as a guide for developing a breakdown of your cost estimate.

Engineering Concerns:

Rule M-10(2)(b) DISPOSAL OF MINING WASTES AND TRASH - PGL

The applicant states that trash and debris will be removed to nearest dump. Disposal of trash, extraneous debris, and other materials incident to the mining operation must be in accordance with the rules and regulations of the State Department of Health (i.e., an authorized landfill).

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There must be a designated area onsite for garbage and associated mine wastes. These materials should be temporarily contained within a dumpster or similar receptacle until transported to the approved disposal area.

Rule M-10(2)(d) POSTING OF WARNING SIGNS - PGL

Warning signs must be posted in all appropriate locations where public access to operations is readily available.

Rule M-10(5) HIGHWALLS - PGL

The applicant states that few highwalls will be developed. All highwalls shall be backfilled or cut back to achieve a slope angle of 45 degrees or less unless waived by the Division and alternative designs or safety measures are justified by the applicant.

Rule M-10(7) ROADS AND PADS - PGL

Who maintains the access roads? Will they be removed after mining? What is the extent of applicant responsibility to reclaim roads.

In our February 20, 1986 letter, you were sent copies of the following forms to be used in preparing your response to that letter. Please use the appropriate forms in response to this letter:

- a) a blank MR-1 form (to amend your previous application)
- b) guideline for noncoal maps
- c) mined land reclamation checklist [minimal requirements which an application should address (use as a reference or guide)]
- d) bond estimate form (reclamation cost breakdown)

If you have need of additional copies of these forms, please contact us at your earliest convenience. If possible, please provide a response to the comments outlined above by April 30, 1986. An expeditious response will help speed the permit review and approval process.

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The Division cannot issue a permit for your operation until your plan is determined complete and all technical concerns resolved. Your cooperation and assistance in finalizing this permitting activity is appreciated. Should you have specific questions or need additional information, please contact me or D. Wayne Hedberg of the permitting staff.

Sincerely,



Lowell P. Braxton
Administrator Mineral Resource
Development and Reclamation
Program

LPB/dmw

cc: Bob Randolph	Randy Harden
Dennis Dalley	James Leatherwood
Samuel Rowley	Kathy Mutz
Wayne Hedberg	Dave Wham

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